

Annual assessment report on the implementation of the Risks of Corruption and Related Offences Prevention Plan

[Pursuant to Article 6(4)(b) of Decree-Law no. Article 6(4)(b) of Decree-Law no. 109-E/2021 of 9 December]

A. Reference period	
Start date	22.02.2023
End date	30.04.2024

A. Assessment of the implementation of the Risk Prevention Plan ("RPP")			
	YES	NO	Observations ¹ (must be filled in if the answer is no, including an explanation of the reasons and the measures to be taken)
a) Does the identification, analysis and classification of risks and situations that may expose the entity to acts of corruption and related offences, including those associated with the roles of the administration and management bodies, considering the industry's reality and the geographical areas in which the entity operates, as stated in the RPP, remain adequate, accurate, complete and up-to-date?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
b) Do the preventive and corrective measures outlined in the RPP aimed at reducing the likelihood of occurrence and the impact of the risks and situations identified therein remain adequate and up-to-date?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
c) Is the internal control system implemented in the institution adequate to ensure, in particular:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
d) Compliance and legality of the resolutions and decisions of the members of the respective bodies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A

¹ Fill in N/A when not applicable.

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e) Respect for the policies and objectives defined?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
f) Compliance with legal and regulatory provisions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
g) Proper risk management and mitigation, taking into account the RPP?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
h) Respect for the principles and values set out in the code of conduct?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
i) Prevention and detection of situations of illegality, corruption, fraud and error?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
j) Safeguarding of assets?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
k) Quality, timeliness, integrity and reliability of the information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
l) Prevention of favouritism or discriminatory practices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
m) Adequate mechanisms for planning, executing, reviewing, controlling and approving operations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
n) Promotion of competition?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A

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o) Transparency of operations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
p) Is the institution's code of conduct adequate and up-to-date to reduce the probability of occurrence and the impact of the risks and situations identified in the RPP?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
q) Is the code of conduct disseminated to all employees of the institution through both the intranet and the official website?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
r) Are the internal training programmes adequate to ensure that both managers and employees of the institution know and understand the policies and procedures implemented to prevent corruption and related offences?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
s) Have the policies and procedures for preventing corruption and related offences implemented in the institution been communicated to the entities with which it interacts?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
t) Is the internal control system implemented in the institution regularly monitored by the compliance officer?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
u) Is the regular monitoring of the implementation of the internal control system reported to the institution's management body (or equivalent) and/or the competent committee?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
v) Are the procedures set out in the RPP, as well as the internal control system, subject to periodic evaluation by the internal audit function?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
w) Are the institution's internal whistleblowing channels able to guarantee the completeness, integrity and preservation of reports, the confidentiality of the identity or anonymity of the	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A

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whistleblowers and the confidentiality of the identity of third parties mentioned in the report, as well as preventing unauthorised access?			
x) Is the prohibition of retaliation against whistleblowers guaranteed and effectively complied with in the follow-up to reports received?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A

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B. Quantification of the degree of implementation of the preventive and corrective measures identified					
Area/Business unit	Activity	Corrective measure	Degree of implementation		Estimation of full implementation
			Implemented	To be implemented	
Insulation Cork BU Amorim Cork Insulation, S.A.	Sales	Effective communication/disclosure of policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Internal training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	By the next annual report
	Purchase of raw cork	Implementation/follow-up of Purchasing Policy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Inclusion of anti-corruption clauses in contracts	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Supplier and intermediary evaluation and selection procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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		Effective communication/disclosure of policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Internal training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	By the next annual report
Raw Materials BU Amorim Florestal, S.A.	Raw materials procurement	Implementation/follow-up of Purchasing Policy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		KYC procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Inclusion of anti-corruption clauses in contracts	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Effective communication/disclosure of policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Supplier and intermediary evaluation and selection procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Internal training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	By the next annual report

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Cork Stoppers BU Amorim Cork, S.A.	Sales	KYC procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Inclusion of anti-corruption clauses in contracts	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Effective communication/disclosure of policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Internal training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	By the next annual report
	Purchase of raw cork	Effective communication/disclosure of policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Inclusion of anti-corruption clauses in contracts	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Internal training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	By the next annual report
	Procurement of non-cork raw materials	Effective communication/disclosure of policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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		Internal training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	By the next annual report
	Marketing and advertising/promotional activity	Effective communication/disclosure of policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Internal training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	By the next annual report
Cork Flooring BU Amorim Cork Flooring, S.A.	Sales	Internal training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	By the next annual report
		Supplier and intermediary evaluation and selection procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Inclusion of anti-corruption clauses in contracts	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Due diligence procedures for foreign subsidiaries and their representatives	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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	Purchase of non-cork goods	Effective communication/disclosure of policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Inclusion of anti-corruption clauses in contracts	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Internal training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	By the next annual report
Cork Composites BU Amorim Cork Composites, S.A.	Sale of composite cork for construction, industry, retail, aerospace industry, etc. from waste materials	Supplier and intermediary evaluation and selection procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Inclusion of anti-corruption clauses in contracts	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Due diligence procedures for foreign subsidiaries and their representatives	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Effective communication/disclosure of policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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		Internal training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	By the next annual report
	Purchase of specialised services (marketing, digital, trade fairs, laboratory tests, construction services, etc.)	Effective communication/disclosure of policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Inclusion of anti-corruption clauses in contracts	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Internal training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	By the next annual report
Procurement (supports all Business Units)	Negotiation of non-cork raw and subsidiary materials	Due diligence procedures for foreign subsidiaries and their representatives	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Supplier and intermediary evaluation and selection procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Inclusion of anti-corruption clauses in contracts			

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			<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Effective communication/disclosure of policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Internal training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	By the next annual report
	Purchase of maintenance goods	Supplier and intermediary evaluation and selection procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Inclusion of anti-corruption clauses in contracts	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Effective communication/disclosure of policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Internal training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	By the next annual report
Energy (supports all Business Units)	Obtaining licences for the electrical installations of the industrial units	Effective communication/disclosure of policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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		Internal training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	By the next annual report
	Purchase of energy for the various BUs	Effective communication/disclosure of policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Internal training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	By the next annual report
Shipping logistics (supports all Business Units)	Import and export logistics	Effective communication/disclosure of policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Internal training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	By the next annual report
		Supplier and intermediary evaluation and selection procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	Subcontracting transport services	Effective communication/disclosure of policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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		Internal training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	By the next annual report
	Customs clearance processes	Effective communication/disclosure of policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Internal training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	By the next annual report
		Supplier and intermediary evaluation and selection procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Corporate Human Resources (supports all Business Units)	Recruitment of employees (senior managers)	Effective communication/disclosure of policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Internal training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	By the next annual report
		Declarations of commitment by applicants	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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Human Resources (Each BU)	Recruitment of employees (middle managers and others)	Effective communication/disclosure of policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Internal training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	By the next annual report
		Declarations of commitment by applicants	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Information Systems and Technology (OSI – Sistemas Informáticos e Eletrotécnicos, Lda.)	Purchase of specific technology and information system services (for all areas and countries)	Supplier evaluation and selection procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Inclusion of anti-corruption clauses in contracts	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Effective communication/disclosure of policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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		Internal training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	By the next annual report
Investor Relations	Interactions with investors Interactions with the CMVM Interactions with rating agencies	KYC procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Effective communication/disclosure of policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Internal training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	By the next annual report
All	Offer of business courtesies	KYC procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Effective communication/disclosure of policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Internal training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	By the next annual report

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	Receipt of business courtesies	Effective communication/disclosure of policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Internal training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	By the next annual report

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C. Additional information

Following the provisions of Law no. 93/2021 of 20 December, Corticeira Amorim has strengthened its compliance with the obligations set out therein by implementing a system for receiving and tracking internal complaints, by means of a computer platform that can be extended to all Group companies.



Pedro Magalhães
Compliance Officer